



## Advice of the NSRAC on the Commission's Non-Paper: Managing Fish Stocks without Catch Option Tables

1. The Commission's non-paper sets out a new approach for stocks subject to poor scientific advice. About 60% of stocks fall within this category (the so-called 'category 6' stocks listed in the Annex to the non-paper).
2. The document sets out a possible new approach concerning the setting of TACs in such cases. The paper proposes that:

*Where there is a scientific advice that a stock is overfished with respect to  $F_{MSY}$ , the TAC should be reduced by (at least) 15%. Conversely, where there is scientific advice that a stock is under-fished with respect to  $F_{MSY}$  the TAC should be increased by 15%.*

*Where representative survey data are available, the TAC would be increased by 15% when the average catch rate in the last two annual surveys is 20% or more higher than the average Catch per Unit Effort (CPUE) in the preceding three surveys if the TAC is restrictive; and the TAC would be reduced by 15% when the average CPUE in the last two annual surveys is 20% or more lower than the average CPUE in the preceding three surveys. If the TAC is not restrictive, then a further 10% reduction should be made.*

*Where survey data indicate no change in stock abundance greater than that set out in paragraph 2, are not available or do not adequately reflect changes in stock abundance, the TAC should remain unchanged.*

3. The NSRAC welcomes the Commission's initiative on this issue, which is a very important one. It has the capacity, if adopted, to affect many different fishing fleets. The Commission's paper is a useful starting point for discussion on how to deal with stocks where there is substantial uncertainty in the assessment. We do have however, a number of concerns about the approach outlined in the paper.
4. Our most fundamental concern relates to the sweeping, broad character of the proposed approach and the need for a more differentiated approach. The stocks included in category 6 vary greatly in their state; it cannot be assumed that they are all under threat. For example there are complexities with the assessment of *Nephrops* that may make the preparation of quantitative catch tables difficult but no one would suggest that this is either a stock that is in jeopardy or one that we have severely limited or compromised information. Yet *Nephrops* would be treated in the

same way as stocks for which there may be real fears and which we know very little. That approach runs counter to common sense.

5. It is not appropriate to treat stocks for which there is a significant amount of information, and for which there are no ground for concern, in the same way as other stocks for which there may be real fears and almost no information. We appreciate that for the purposes of setting TACs it would be convenient to hold to a simply three category scheme but we think that that is forcing reality into too rigid a decision making framework. The simple rules being proposed will not work well for all stocks falling within category 6.
6. The NSRAC wishes to make the general point that it is first important to increase the level of scientific information which is available for stocks falling within category 6. The NSRAC is especially concerned that information available to fishers themselves is not always fully used in assessments. In some case, like the deep-sea stocks, information has been offered to scientists but has not been utilised. CPUE data is often ignored despite its value as a possible proxy for the state of stocks. Industry/science partnerships, the establishment of reference fleets, and the conduct of fishers' surveys offer sensible ways forward. The NSRAC would like to discuss the implementation of a more industry-based approach to collecting information with the Commission, and has already been discussing these matters with scientists through participation in the recent ICES Benchmarking Workshops.
7. The Commission's paper has a rather narrow focus on situations when the TAC is not deemed to be restrictive. In fact a TAC can be underutilised for a number of reasons that have nothing to do with the conservation status of the stock. It is simply wrong in principle to reduce TACs on the basis of a blind formula linked to underutilisation.
8. The NSRAC would wish to discuss the definition of  $F_{MSY}$  further. The NSRAC recognises that compliance with the WSSD implementation plan is an important objective. However, the Edinburgh Workshop held by the NSRAC confirmed that  $F_{MSY}$  is an abstraction which cannot be determined directly. A proxy has to be found. In practice  $F_{MSY}$  will be a moving target for some stocks. Definition of more pragmatic and stable targets for all stocks is an important component of the fisheries management plans that the NSRAC wishes to see put in place for all the North Sea fisheries. Until we have an agreed and accepted definition of the MSY target it is difficult to see how it is possible to set TACs in relation to it.
9. The NSRAC accepts that the non-paper is a good first attempt at setting out management arrangements for stocks which do not have an analytical assessment. However, the NSRAC would like to more open discussions with ICES, STECF and the Commission on how management arrangements might differentiate between stocks, depending on the information available and their current state. The NSRAC should be involved in this important debate.



NSRAC Chairman